



February 12, 2025

***E-Filed***

The Honorable Vince Chhabria  
450 Golden Gate Avenue  
17th Floor, Courtroom 4  
San Francisco, CA 94102

Re: *Kadrey, et al v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC  
Update re: Dkt. 420 and Dkt. 424

Dear Judge Chhabria,

We write on behalf of Defendant Meta Platforms, Inc. (“Meta”), to provide an update regarding our letters submitted on Friday (Dkt. 420) and Monday (Dkt. 424), as we indicated we would in our Monday letter.

As explained in Meta’s prior letters, Meta and its counsel have worked as quickly as possible to assess and review the documents that Meta’s e-discovery vendor inadvertently sequestered, and to produce responsive documents and privilege logs. By end of day today, Meta will have completed its production from the inadvertently sequestered documents. Specifically:

**Monday, February 10, 2025:**

Meta produced its initial, primary production of non-privileged responsive documents. This production totaled 827 documents, including family members. Out of the 827 documents, 356 documents were responsive to Plaintiffs’ discovery requests, including 23 French language documents. The remaining 471 documents were family members linked to the responsive documents.

**Tuesday, February 11, 2025:**

Meta produced documents with partial redactions for privilege, a privilege log, and additional non-privileged responsive documents. This production totaled 487 documents, including family members. Out of the 487 documents, 194 documents were responsive to Plaintiffs’ discovery requests, including 27 French language documents. The remaining 293 documents were non-privileged family members linked to the responsive documents.

Meta’s privilege log included 99 documents produced as redacted and 67 documents fully withheld on privilege and/or work product grounds. Meta also identified the 146 non-privileged family members on the log.

**Wednesday, February 12, 2025:**

Today, Meta will produce 34 additional documents, 3 of which are French language documents which have 5 family members, 11 of which are slipsheets for documents withheld as privileged, and 15 of which are non-privileged family members to these 11 withheld documents. Meta will also provide an amended privilege log that will add Bates numbers for the 11 withheld documents and associated family members discussed in the preceding sentence, and add 3 documents produced as redacted and 1 document withheld as privileged.

Meta will provide the Court with a copy of Meta’s privilege log referenced above. Meta will contact the Court’s deputy clerk for instructions on how the Court would prefer to receive the privilege log.

# Cooley

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Meta also encloses a declaration from Meta's vendor, Lighthouse, explaining the circumstances of the inadvertent sequestration. (Ex. 1.) Lighthouse has confirmed that no other documents were subject to inadvertent sequestration (Ex. 1, ¶ 29).

Meta's review of and production from the inadvertently sequestered documents is complete. In light of the Court's Order stating that it will address this issue further at the February 27, 2025 hearing (Dkt. 425), Meta does not intend to provide further updates on this issue unless requested by the Court. Meta will meet and confer with Plaintiffs in preparation for the Court's February 27, 2025 hearing.

Meta again sincerely apologizes for this issue and appreciates the Court's consideration.

Respectfully submitted,

/s/ Bobby Ghajar  
/s/ Kathleen Hartnett  
Bobby A. Ghajar  
Kathleen Hartnett  
COOLEY LLP

*Counsel for Defendant Meta Platforms, Inc.*